

**Exhibit A – Documents to be Produced**

1. Insurance Policies and all endorsements related thereto from 2012 to the present.
2. Applications for insurance, including all schedules and attachments thereto, and any communications relating thereto and all underwriting files pertaining thereto.
3. Claims made against the Insurance Policies and all communications between the Debtor or any other insured under the policy, and all communications relating thereto.
4. All letters and other communications between the Insurance Companies, the Debtor, and any insured under the policy relating to coverage or denial of coverage by the Insurance Companies.
5. Claims file for each claim made on the policy including but not limited to all adjusters records relating to ever claim.
6. Any recommendations, memos, or reports made by any claims adjuster or other person to determine coverage under the policies issued by the Insurance Companies.
7. All memos or other writings showing the decision made by each Insurance Company for coverage or denial of coverage on any Insurance Policy issued by the Insurance Companies.
8. All documents listed in any disclosure statement in any litigation in which the Debtor and the Insurance Companies may be a party.
9. All policy and procedure manuals utilized by the Insurance Companies for reviewing claims under the Insurance Policies issued by the Insurance Companies.
10. All auditors' reports, studies, memos, or other documents relating to the claims made under any of the Insurance Policies issued by the Insurance Companies.